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08/09/2004 06:06 PM

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Subject: Environmental Defense comments on Monomethylformamide (CAS# 123-39-7)

(Submitted via Internet 8/9/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Edwin.L.Mongan-1@usa.dupont.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Monomethylformamide (CAS# 123-39-7).

E.I. du Pont de Nemours & Company, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing data to address SIDS elements required for Monomethylformamide (MMF). According to the thorough and well-written test plan, MMF is synthesized in one du Pont plant and used primarily (greater than 95%) in another plant as a chemical intermediate in the synthesis of other chemicals and as a solvent for chemical synthesis of resins. Less than 5% of total production is sold to other customers, but those customers are both national and international. Therefore, all MMF produced is transported to some degree. The sponsor states that transport is primarily in railcars and that in the absence of a spill, potential for environmental or human exposure is limited to occupational settings, where measures are taken to limit exposures.

Data to address SIDS elements required under the HPV Challenge indicate MMF presents little threat to human or environmental health, as it has low mammalian and environmental toxicity and degrades rapidly in the environment.

Data are described in the test plan and in the detailed and well-referenced robust summaries to address most of the required SIDS elements for MMF. In those incidences where data on MMF are not available, studies are described for its closely related structural analog, N,N-dimethyl formamide (DMF). Given the close structural and chemical similarity of these two chemicals, we think the use of data developed for DMF to fill data gaps for MMF is appropriate.

It is noted that repeated exposure to MMF does produce some developmental effects in rats and rabbits, but only at doses that are toxic to the dams. Data bridged from DMF indicate MMF should not be toxic to reproduction and is not genotoxic.

Thus, including bridging data from DMF to fill data gaps for MMF, all SIDS elements have been satisfactorily addressed for MMF and this submission appears to be complete and acceptable to meet the requirements of the HPV Challenge.

Thank you for this opportunity to comment.

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